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CUNNINGHAM DUCT WORK s/h/i/a
CUNNINGHAM DUCT CLEANING CO., INC.
26 Broadway - 28th Floor
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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**IN RE COMBINED WORLD TRADE CENTER
AND LOWER MANHATTAN DISASTER SITE
LITIGATION**
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21 MC 102 (AKH)

TERESITA CAYETANO,

DOCKET NO.:
07 CV 05282

Plaintiff,

-against-

**100 CHURCH, LLC, 120 BROADWAY
CONDOMINIUM (CONDO # 871), 120 BROADWAY
HOLDING, LLC., 120 BROADWAY PROPERTIES,
LLC., 120 BROADWAY, LLC, 80 LAFAYETTE
ASSOCIATES, LLC., AMBIENT GROUP, INC.,
AMERICAN EXPRESS BANK, LTD., AMERICAN
EXPRESS COMPANY, AMERICAN EXPRESS
TRAVEL RELATED SERVICES, COMPANY, INC.,
B.R. FRIES & ASSOCIATES, INC., BFP TOWER
C CO., LLC., BFP TOWER C MM LLC.,
BLACKMON-MOORING STEAMATIC
CATASTROPHE, INC., d/b/a BMS CAT, BLUE
MILLENNIUM REALTY, LLC., BOARD OF
MANAGERS OF THE 120 BROADWAY CONDOMINIUM,
(CONDO # 871), CENTURY 21, INC.,
CITIBANK, NA., CUNNINGHAM DUCT CLEANING CO.,
GPS ENVIRONMENTAL CONSULTANTS, INC.,
GRUBB & ELLIS MANAGEMENT SERVICES,
HILLMAN ENVIRONMENTAL GROUP, LLC.,
INDOOR AIR PROFESSIONALS, INC., INDOOR
ENVIRONMENTAL TECHNOLOGY, INC.,
LAW ENGINEERING, P.C., LEHMAN
BROTHERS HOLDINGS, INC., LEHMAN**

**NOTICE OF
ADOPTION OF
ANSWER TO MASTER
COMPLAINT**

BROTHERS, INC., LEHMAN COMMERCIAL PAPERS, INC., MAYORE ESTATES, LLC., MAYORE ESTATES, LLC., AND 80 LAFAYETTE ASSOCIATION, LLC., AS TENANTS IN COMMON, MERRILL LYNCH & CO., INC., MOODY'S HOLDINGS, INC., ROYAL AND SUNALLIANCE INSURANCE GROUP, PLC., SILVERTSTEIN PROPERTIES, INC., STONER AND COMPANY, INC., SUN LAU REALTY CORP., TRAMMELL CROW CORPORATE SERVICES, INC., TRC ENGINEERS, INC., WFP TOWER RETAIL CO., G.P., CORP., WFP RETAIL CO., L.P., and ZAR REALTY MANAGEMENT CORP.,

Defendants.

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PLEASE TAKE NOTICE, that defendant **CUNNINGHAM DUCT WORK s/h/i/a CUNNINGHAM DUCT CLEANING CO., INC.** ("CUNNINGHAM"), by its attorneys, **RUSSO, KEANE & TONER, LLP**, as and for its Response to the allegations set forth in the Complaint by Adoption (Check-Off-Complaint) Related to the Master Complaint filed in the above referenced action, hereby adopt their Answer to Master Complaint dated, August 1, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant, **CUNNINGHAM** demands judgment dismissing the above captioned caption action as against it, together with its costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York

April 28, 2008

Kevin G. Horbatiuk

Kevin G. Horbatiuk (KGH4977)

Matthew P. Mazzola (MM7427)

Attorneys for Defendant

**CUNNINGHAM DUCT WORK s/h/i/a
CUNNINGHAM DUCT CLEANING
CO., INC.**

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RKT File No. 824.078

TO: CHRISTOPHER R. LaPOLA, ESQ.,
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CERTIFICATION OF SERVICE

I hereby certify that a copy of the above and foregoing has been served upon the following listed person by placing a copy of the same in the United States mail, postage prepared and properly addressed, this the 30TH day of April, 2008.

CHRISTOPHER R. LaPOLA, ESQ.,
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